



United States  
Department of  
Agriculture

Forest  
Service

Caribou-Targhee National Forest HQ

1405 Hollipark Drive  
Idaho Falls, ID 83401  
208-529-1020  
FAX: 208-557-5827

SCM  
053 0531

File Code: 2160

Date: March 21, 2017

Alan Prouty  
Vice President,  
Environmental & Regulatory Affairs  
J.R. Simplot Company  
P.O. Box 27- 83707  
1099 W. Front Street  
Boise, ID 83702

UPS: 1ZE273430394482735

US EPA

MAR 28 2017

IDAHO OPERATIONS OFFICE

RE: Agencies' Comments on the Response to Additional Comments on the Smoky Canyon Mine RI/FS Draft Phase 2 Pilot Study Work Plan and Sampling and Analysis Plan Ultra-Filtration/Reverse Osmosis and Biological Selenium Removal Fluidized Bed Bioreactor Treatment Technology

Dear Alan,

The Agencies have reviewed Simplot's Response to Comments (RTCs) on the Additional Agencies' Comments for Smoky Canyon Mine RI/FS Draft Phase 2 Pilot Study Work Plan and Sampling and Analysis Plan Ultra-Filtration/Reverse Osmosis and Biological Selenium Removal Fluidized Bed Bioreactor Treatment Technology.

The Agencies' response to Simplot's RTCs (dated March 3, 2017) are attached.

Please respond to these comments and submit a final document by April 28, 2017.

If you have any questions, please contact me at 208-236-7572.

Sincerely,

ARTHUR BURBANK  
Remedial Project Manager

Enclosure

cc: Jeffery Hamilton; Simplot, Pocatello  
Ron Quinn; Simplot, Smoky Canyon Mine  
Burl Ackerman; Simplot, Boise  
Fred Charles; Formation Environmental, Boulder  
Sandi Fisher; USFWS, Pocatello  
Colleen O'Hara; BLM, Pocatello

Brady Johnson; IDEQ, State Office  
Wayne Crowther; IDEQ, Pocatello  
Matt Wilkening, EPA  
Kelly Wright; Shoshone-Bannock Tribes, Fort Hall  
Susan Hanson; Shoshone-Bannock Tribes, Fort Hall  
Rick McCormick; CH2M Hill, Boise



Caring for the Land and Serving People

USEPA SF



1561441

## **Agencies' Response to Simplot RTCs on Agencies Additional Comments – Smoky Canyon Mine RI/FS Draft Phase 2 Pilot Study WP and SAP Ultra-Filtration/Reverse Osmosis and Biological Selenium Removal Fluidized Bed Bioreactor Treatment Technology**

---

### **Specific Comments:**

- AC-1 Based on the response, it appears that the system would meet the goal of  $\leq 7$  ug/l. However, the assumptions used in making this determination are based on the higher end of the efficiencies observed during the prior testing, and are using average concentrations in the calculations. This does not present the most conservative approach. It is recommended that in periods with concentrations nearer to the maximum levels the system be closely monitored to see if additional dilution is required from RO treated water.
- AC-3 It is recommended that Appendix D to the Work Plan be updated as well to insure the two documents do not contain conflicting information.